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11
12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Xiao Ye Bai,

15 Plaintiff,

16 v.

17 Calvin Johnson, *et al.*,

18 Defendants.

Case No. 2:20-cv-02192-RFB-EJY

**First Stipulation for Revised
Scheduling Order**

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21 Pursuant to FRCP 16(b)(4) and Local Rule 26-2, the parties stipulate and agree
22 to modify/extend the Scheduling Order (ECF No. 151). This would be the first
23 stipulation for a revised scheduling order. This stipulated proposed order is made in
24 good faith and is supported by good cause.
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STATEMENT OF FACTS IN SUPPORT OF STIPULATION

Following an April 22, 2024 status hearing, this court directed that a third amended complaint and a joint proposed scheduling order be submitted within 60 days. ECF No. 150. The parties submitted a stipulated order adopted by the Court (ECF No. 151), under which, *inter alia*, discovery would commence with the filing of Defendants' responsive pleading on August 20, 2024 and continue until February 18, 2025.

Plaintiffs served a request for the production of documents on Defendants on September 6, 2024, and later provided initial disclosures. A dispute thereafter arose over whether a stay should be granted pending the resolution of a motion to dismiss, as a result of which Defendants initially declined to provide documents. See generally ECF No. 163. After the Court denied Defendants' motion to stay, Defendants provided documents on November 22, 2024 pursuant to a new deadline set by the Court. ECF No. 164 at 3. Counsel for Mr. Bai has since been organizing and reviewing these documents, which total more than a thousand pages, to determine what other discovery will need to be pursued.

For all these reasons, additional time will be needed to complete discovery in this case and good cause exists for an extension of the current deadlines. The parties request the existing deadlines be extended by nineth (90) days as follows:

- The parties may then engage in a discovery on **May 19, 2025**;
- Expert disclosures must be made on or before **March 18, 2025**, and disclosures of rebuttal experts must be made on or before **April 17, 2025**.
- Dispositive Motions: that they be filed and served no later than **June 18, 2025**;

- Joint Pretrial Order: that it be due on **July 18, 2025**. If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

CONCLUSION

Based on the foregoing and for good cause appearing, the Parties respectfully request that the Court approve their Stipulation and alter the discovery deadlines as set forth above.

Dated December 20, 2024

Aaron D. Ford
Attorney General

Rene L. Valladares
Federal Public Defender

/s/ Leo T. Hendges

/s/ Ryan Norwood

Leo T. Hendges
Senior Deputy Attorney General

Ryan Norwood
Assistant Federal Public Defender

IT IS SO ORDERED:


U.S. MAGISTRATE JUDGE

Dated: December 20, 2024